

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MARIANE PEARL, in her own right and as
Representative of the ESTATE OF DANIEL
PEARL, Deceased and as GUARDIAN FOR their
MINOR SON,

Plaintiffs,

v.

AHMED OMAR SAEED SHEIKH a/k/a
"CHAUDREY BASHIR" a/k/a "BASHIR",
SHEIKH MOHAMMED ADEEL, AFTAB
ANSARI, FAISAL BHATTI a/k/a ZUBAIR
CHISHTI, NAEEM BUKHARI a/k/a QARI
ATAUR RAHMAN, AMJAD FAROOQI
(Deceased) a/k/a MANSUR HASNAIN a/k/a
IMTIAZ SIDDIQUI a/k/a HAYDER OR
HAIDER, FAZEL KARIM, ALI KHAN, SAUD
MEMOM, The ESTATE OF SAUD MEMON And
HEIRS OF SAUD MEMON, KHALED SHEIKH
MOHAMMED, FAHAD NASEEM,
MOHAMMED HASHIM QADEER a/k/a "ARIF"
a/k/a HASHIM KADIR, ABDUL RAHMAN,
ASIF RAMZI (Deceased), SALMAN SAQIB a/k/a
SYED SULEIMAN SAQUIB, AL RASHID
TRUST, AL AKHTAR TRUST
INTERNATIONAL a/k/a AL AKHTAR TRUST,
AL QAEDA, HABIB BANK LIMITED,
HARAKAT UL-MUJAHEDDEEN, HARAKAT
UL-MUJAHEDDEEN AL-ALMI, JAISH-E-
MOHAMMED, LASHKAR-E-JHANGVI,

Defendants.

07 Civ. 6639

**MOTION TO ADMIT
COUNSEL *PRO HAC VICE***

FILED
U.S. DISTRICT COURT
2007 SEP 26 PM 1:02
SOUTHERN DISTRICT OF NEW YORK

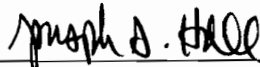
PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for
the Southern and Eastern Districts of New York, I, Joseph S. Hall, a member in good standing of
the bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of

Applicant's Name: David E. Ross
Firm Name: Kellogg, Huber, Hansen, Todd, Evans & Figel, P.L.L.C.
Address: 1615 M Street, N.W., Suite 400
Washington, D.C., 20036
Phone Number: 202-326-7919
Fax Number: 202-326-7999

David E. Ross is a member in good standing of the Bars of the States of Maryland and New Jersey and the District of Columbia. There are no pending disciplinary proceedings against David E. Ross in any State or Federal Court.

Dated: September 25, 2007

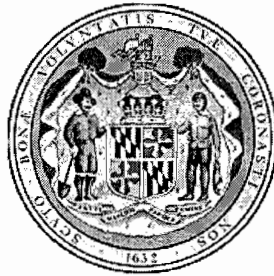
Respectfully submitted,



Joseph S. Hall
SDNY Bar Code: JH-2612
KELLOGG, HUBER, HANSEN, TODD,
EVANS & FIGEL, P.L.L.C.
1615 M Street, N.W., Suite 400
Washington, D.C. 20036
202-326-7900
202-326-7999

*Counsel for Defendant Habib Bank
Limited*

**Court of Appeals
of Maryland**
Annapolis, MD



CERTIFICATE OF GOOD STANDING

STATE OF MARYLAND, ss:

*I, Alexander L. Cummings, Clerk of the Court of Appeals of Maryland,
do hereby certify that on the fourteenth day of December, 1995,*

David Evan Ross

*having first taken and subscribed the oath prescribed by the Constitution and
Laws of this State, was admitted as an attorney of said Court, is now in good
standing, and as such is entitled to practice law in any of the Courts of said
State, subject to the Rules of Court.*

In Testimony Whereof, *I have hereunto
set my hand as Clerk, and affixed the Seal
of the Court of Appeals of Maryland, this
seventeenth day of September, 2007.*

Alexander L. Cummings
Clerk of the Court of Appeals of Maryland

Supreme Court of New Jersey

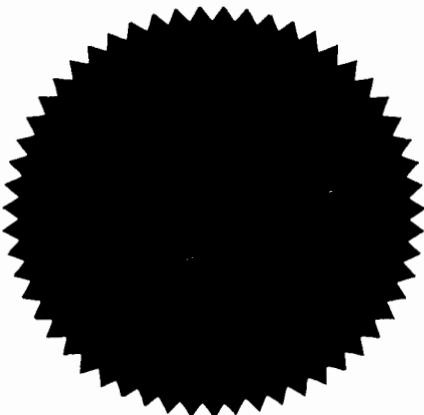


Certificate of Good Standing

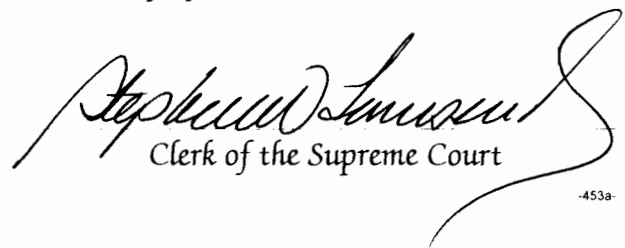
This is to certify that **DAVID EVAN ROSS**
(No. **045061995**) was constituted and appointed an Attorney at Law of New
Jersey on **December 18, 1995** and, as such,
has been admitted to practice before the Supreme Court and all other courts of this State
as an Attorney at Law, according to its laws, rules, and customs.

I further certify that as of this date, the above-named is an Attorney at Law in
Good Standing. For the purpose of this Certificate, an attorney is in "Good Standing"
if the Court's records reflect that the attorney: 1) is current with all assessments
imposed as a part of the filing of the annual Attorney Registration Statement, including,
but not limited to, all obligations to the New Jersey Lawyers' Fund for Client
Protection; 2) is not suspended or disbarred from the practice of law; 3) has not
resigned from the Bar of this State; and 4) has not been transferred to Disability
Inactive status pursuant to Rule 1:20-12.

*Please note that this Certificate does not constitute confirmation of an attorney's
satisfaction of the administrative requirements of Rule 1:21-1(a) for eligibility to
practice law in this State.*



In testimony whereof, I have
hereunto set my hand and
affixed the Seal of the
Supreme Court, at Trenton, this
20TH day of **September** , 20 **07**


Clerk of the Supreme Court



District of Columbia Court of Appeals
Committee on Admissions
500 Indiana Avenue, N.W. — Room 4200
Washington, D. C. 20001
202 / 879-2710


I, GARLAND PINKSTON, JR., Clerk of the District of Columbia
Court of Appeals, do hereby certify that

DAVID EVAN ROSS

was on the 8TH day of NOVEMBER, 1996
duly qualified and admitted as an attorney and counselor and
entitled to practice before this Court and is, on the date
indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have
hereunto subscribed my name
and affixed the seal of this
Court at the City of
Washington, D.C., on
September 18, 2007.

GARLAND PINKSTON, JR., CLERK

By: 
Deputy Clerk

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MARIANE PEARL, in her own right and as
Representative of the ESTATE OF DANIEL
PEARL, Deceased and as GUARDIAN FOR their
MINOR SON,

Plaintiffs,

v.

AHMED OMAR SAEED SHEIKH a/k/a
"CHAUDREY BASHIR" a/k/a "BASHIR",
SHEIKH MOHAMMED ADEEL, AFTAB
ANSARI, FAISAL BHATTI a/k/a ZUBAIR
CHISHTI, NAEEM BUKHARI a/k/a QARI
ATAUR RAHMAN, AMJAD FAROOQI
(Deceased) a/k/a MANSUR HASNAIN a/k/a
IMTIAZ SIDDIQUI a/k/a HAYDER OR
HAIDER, FAZEL KARIM, ALI KHAN, SAUD
MEMOM, The ESTATE OF SAUD MEMON And
HEIRS OF SAUD MEMON, KHALED SHEIKH
MOHAMMED, FAHAD NASEEM,
MOHAMMED HASHIM QADEER a/k/a "ARIF"
a/k/a HASHIM KADIR, ABDUL RAHMAN,
ASIF RAMZI (Deceased), SALMAN SAQIB a/k/a
SYED SULEIMAN SAQUIB, AL RASHID
TRUST, AL AKHTAR TRUST
INTERNATIONAL a/k/a AL AKHTAR TRUST,
AL QAEDA, HABIB BANK LIMITED,
HARAKAT UL-MUJAHEDDEEN, HARAKAT
UL-MUJAHEDDEEN AL-ALMI, JAISH-E-
MOHAMMED, LASHKAR-E-JHANGVI,

Defendants.

07 Civ. 6639

**AFFIDAVIT OF
JOSEPH S. HALL IN
SUPPORT OF MOTION
TO ADMIT COUNSEL
PRO HAC VICE**

District of Columbia) ss:

Joseph S. Hall, being duly sworn, hereby deposes and says as follows:

1. I am a partner at Kellogg, Huber, Hansen, Todd, Evans & Figel, P.L.L.C., counsel
for Defendant Habib Bank Limited in the above-captioned action. I am familiar with the

proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of defendant's motion to admit David E. Ross as counsel *pro hac vice* to represent defendant Habib Bank Limited in this matter.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law on October 24, 2000. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. I have known Mr. Ross since October 2001.

4. Mr. Ross is a partner at Kellogg, Huber, Hansen, Todd, Evans & Figel, P.L.L.C., in Washington, D.C.

5. I have found Mr. Ross to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.

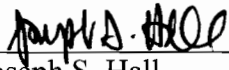
6. Accordingly, I am pleased to move the admission of David E. Ross, *pro hac vice*.

7. I respectfully submit a proposed order granting the motion to admit David E. Ross, *pro hac vice*, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit David E. Ross, *pro hac vice*, to represent defendant Habib Bank Limited in the above captioned matter, be granted.

Dated: September 25, 2007
District of Columbia


Respectfully submitted,



Joseph S. Hall
SDNY Bar Code: JH-2612

District of Columbia: SS
Subscribed and Sworn to before me

this 25th day of September, 2007.



Notary Public, D.C.

My commission expires 10/31/2011

Diane M. Cooke
Notary Public, District of Columbia
My Commission Expires 10/31/2011

Exhibit A

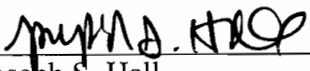
CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing MOTION TO ADMIT COUNSEL *PRO HAC VICE* and AFFIDAVIT OF JOSEPH S. HALL IN SUPPORT OF MOTION TO ADMIT COUNSEL *PRO HAC VICE* was served via overnight mail, this 25th day of September, 2007.

Michael E. Elsner
Ronald L. Motley
Jodi Westbrook Flowers
MOTLEY RICE LLC
28 Bridgeside Boulevard
P.O. Box 1792
Mount Pleasant, SC 29465
Tel.: 843-216-9000

Counsel for Plaintiffs Mariane Pearl, in her own right and as Representative of the Estate of Daniel Pearl, Deceased and as Guardian for their Minor Son

Respectfully submitted,



Joseph S. Hall
SDNY Bar Code: JH-2612